

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

TONY KHOURY, Individually and on
Behalf of All Others Similarly Situated,

Plaintiff,

v.

FXCM INC., DROR NIV, and ROBERT
LANDE,

Defendants.

Case No. 1:17-cv-00916-RA

YING ZHAO, Individually and on Behalf
of All Others Similarly Situated,

Plaintiff,

v.

FXCM INC., DROR NIV, and ROBERT
LANDE,

Defendants.

Case No. 1:17-cv-00955-UA

DAVID BLINN, Individually and on Behalf
of All Others Similarly Situated,

Plaintiff,

v.

FXCM INC., DROR NIV, and ROBERT
LANDE,

Defendants.

Case No. 1:17-cv-01028-RA

683 CAPITAL PARTNERS, L.P.,
Individually and on Behalf of All Others
Similarly Situated,

Plaintiff,

v.

Case No. 1:17-cv-02506-UA

GLOBAL BROKERAGE, INC. f/k/a
FXCM INC., DROR NIV, and ROBERT
LANDE,

Defendants.

**NOTICE OF THOMAS KELLY'S MOTION FOR CONSOLIDATION OF
RELATED ACTIONS, APPOINTMENT AS LEAD PLAINTIFF
AND APPROVAL OF LEAD COUNSEL**

TO THE CLERK OF THE COURT, ALL PARTIES, AND THEIR RESPECTIVE ATTORNEYS OF RECORD:

PLEASE TAKE NOTICE that Thomas Kelly (“Movant”) respectfully moves this Court for an order: (1) consolidating the Related Actions; (2) appointing Movants as Lead Plaintiff pursuant to Section 21D(a)(3)(B) of the Securities Exchange Act of 1934 (“Exchange Act”), as amended by the Private Securities Litigation Reform Act of 1995 (the “PSLRA”); and (3) approving Movant’s selection of Glancy Prongay & Murray LLP and Bragar Eigel & Squire P.C. as co-lead Counsel for the Class.

Movant seeks appointment as lead plaintiff and approval of his choice of counsel pursuant to the Exchange Act, the Federal Rules of Civil Procedure and the PSLRA. This motion is based on this notice, the attached memorandum of law, the declaration of Lesley F. Portnoy, and the Court’s complete files and records in this action, as well as such further argument as the Court may allow at a hearing on this motion.

Respectfully submitted,

DATED: April 10, 2017

GLANCY PRONGAY & MURRAY LLP

By: s/ Lesley F. Portnoy
Lesley F. Portnoy (LP-1941)
122 East 42nd Street, Suite 2920
New York, New York 10168
Telephone: (212) 682-5340
Facsimile: (212) 884-0988
lportnoy@glancylaw.com

-and-

GLANCY PRONGAY & MURRAY LLP

Lionel Z. Glancy
Robert V. Prongay
Casey E. Sadler
1925 Century Park East, Suite 2100
Los Angeles, California 90067
Telephone: (310) 201-9150
Facsimile: (310) 201-9160

BRAGAR EAGEL & SQUIRE P.C.

Melissa A. Fortunato
Todd H. Henderson
885 Third Avenue, Suite 3040
New York, NY 10022
Telephone: (212) 355-4648
Facsimile: (212) 214-0506

*[Proposed]Co-Lead Counsel for Movant
and the Class*

**PROOF OF SERVICE BY ELECTRONIC POSTING PURSUANT TO SOUTHERN
DISTRICT OF NEW YORK ECF AND LOCAL RULES AND BY MAIL
ON ALL KNOWN NON-REGISTERED PARTIES**

I, the undersigned say:

I am not a party to the above case and am over eighteen years old.

On April 10, 2017, I served true and correct copies of **NOTICE OF THOMAS KELLY'S MOTION FOR CONSOLIDATION OF RELATED ACTIONS, APPOINTMENT AS LEAD PLAINTIFF AND APPROVAL OF LEAD COUNSEL**, by posting the document electronically to the ECF website of the United States District Court for the Southern District of New York, for receipt electronically by the parties listed on the Court's Service List.

I affirm under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed on April 10, 2017 at Los Angeles, California.

s/ Lesley F. Portnoy
Lesley F. Portnoy

Mailing Information for a Case 1:17-cv-00916-RA Khoury et al v. FXCM Inc. et al

Electronic Mail Notice List

The following are those who are currently on the list to receive e-mail notices for this case.

- **Israel Dahan**
idahan@kslaw.com,jcmccullough@kslaw.com
- **Matthew Moylan Guiney**
guiney@whafh.com
- **Phillip C. Kim**
pkim@rosenlegal.com
- **Roger Alan Sachar , Jr**
rsachar@nflp.com

Manual Notice List

The following is the list of attorneys who are **not** on the list to receive e-mail notices for this case (who therefore require manual noticing). You may wish to use your mouse to select and copy this list into your word processing program in order to create notices or labels for these recipients.

- (No manual recipients)